DOCUMENT RESUME

ED 150 321 CE 014 469

TITLE	A Planning Charter for the Youth Employment and Demonstration Projects Act of 1977.
INSTITUTION	Employment and Training Administration (DOL), Washington, D.C. Office of Youth Programs.
PUB DATE	Aug 77
NOTE	23p.
EDRS PRICE	MF-$0.83 HC-$1.67 Plus Postage.
DESCRIPTORS	Administrative Policy; *Administrative Principles; *Community Programs; Employment Programs; Federal Legislation; Federal Programs; *Job Training; National Programs; Objectives; Program Descriptions; *Program Design; *Program Development; Program Guides; Program Planning; Work Experience Programs; Youth; *Youth Employment; Youth Programs
IDENTIFIERS	United States; *Youth Employment and Demonstration Projects Act

ABSTRACT

This planning charter for the Youth Employment and Demonstration Projects Act (YEDPA) explains the Department of Labor's basic principles in designing and implementing YEDPA programs to provide a framework for the development of YEDPA efforts. This booklet is divided into six sections. The first section briefly discusses priorities regarding the basic YEDPA program components and goals. Constraints regarding resources, programmatic foundation, limited staff, and program diversity are examined in the second section. Section 3 presents ten general principles which are central in the design and implementation of YEDPA. Attainable objectives for fiscal 1978, fiscal 1979, and the future are listed in section 4. Section 5 covers programmatic implications and describes the important elements of five new programs to provide a framework for forthcoming guidelines and technical assistance materials, and the final section briefly discusses the challenge of YEDPA. (EM)

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A Planning Charter for the Youth Employment and Demonstration Projects Act of 1977

U.S. Department of Labor
Employment and Training Administration
Office of Youth Programs
August 1977

ED150321

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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President Carter has pledged to open administrative decisionmaking to public scrutiny and to explain Government actions in understandable terms. This Planning Charter for the Youth Employment and Demonstration Projects Act (YEDPA), signed into law by the President on August 5, 1977, is an attempt to meet this pledge. The document outlines the Department of Labor's basic principles in designing and implementing YEDPA programs, the constraints which must be considered, the realistic objectives, and the programmatic implications. The Act is ambitious and complex so this Charter is not simple. But we hope it explains our basic intentions. The YEDPA provides the resources and the mandate for substantively improving the employment prospects of our Nation's youth. We must all work together to assure the success of these crucially important efforts.

Ernest G. Green
Assistant Secretary
for Employment and Training

SETTING PRIORITIES

The Youth Employment and Demonstration Projects Act of 1977 (YEDPA) will have a major impact on youth. It will employ and increase the future employability of several hundred thousand young persons. It will help to coordinate and improve existing career development and manpower programs. And it will experiment with a number of new approaches. YEDPA contains four distinct programmatic components: employing youth in conservation work, using their labor in community improvement projects, providing a year-round structured work experience as an entitlement to encourage school completion, and offering a range of employment and training services adapted to local needs. Discretionary funds are provided to test a range of ideas through discrete demonstrations. The YEDPA is already funded at the $1 billion level for fiscal 1978 with a supplemental of $0.5 billion anticipated.

New legislation of such scale and scope opens exciting possibilities, but the potential is not limitless. It is important to focus our energies and resources where they can have their greatest effect, choosing among competing and deserving approaches and priorities. As might be expected in such an ambitious Act, there are a number of basic issues which remain to be resolved in the course of program design, implementation, administration, and evaluation. This Planning Charter outlines the constraints, principles, targets and basic interpretations of program intent which are the framework for these administrative decisions.

At the most elementary level priorities must be assigned to the basic goals of the YEDPA, which in some ways conflict with one another. The Act seeks both increased employment for youth and increased preparation for later employment. The greatest number of jobs can be created when wages are low, hours limited, services and supervision held to a minimum. Employability development involves training and other services, more structured work settings with heavier supervision and support; in other words, higher unit costs and fewer jobs. It is necessary to strike a balance between immediate employment and longer term employability development.

The Act is intended to coordinate and improve the quality of career development, employment and training services currently available for youth. Institutional change is a time-consuming process requiring careful planning and a measured approach. A choice must be made between rapid implementation to achieve immediate employment impacts, and a more careful implementation to achieve coordination and change. Quality in programs is difficult to enforce and efforts to promote and monitor qualitative improvements complicate administration. How much priority should be given to doing new and different things, or changing what exists, as opposed to expanding efforts of demonstrated if not maximal value?

This is a "demonstration projects" Act, emphasizing research and experimentation because Congress does not believe it has the knowledge and information to set long-term policies. Carefully structured experiments take time. Technical rigor and discipline usually conflict with operational expediency. A balance must, therefore, be reached in determining how much emphasis should be placed on the varied goals of employment, employability development, reform and experimentation.

There are countless other issues which also must be resolved The YEDPA introduces a complex set of procedures for handling wage setting and maintenance-of-effort questions. It envisions some new mechanisms for project selection and it leaves wide latitude for the use of discretionary funds. Untried institutional linkages between the education, and employment and training systems are mandated. The concept of academic credit for work experience is given a strong push.

All these issues demand administrative resolution, with guidance from the legislative record, discussions with Congress, other departments, and representatives of State and local governments, community organizations, business, labor and youth. The decisions must consider the constraints involved. They must be based on a set of agreed upon principles. Realistic targets should be established. And the programmatic implications should be carefully analyzed and articulated. This Charter seeks to achieve these ends,

letting everyone know as straightforwardly as possible where the Department of Labor (DOL) is going and why, in implementing this very significant yet challenging piece of social legislation.

RECOGNIZING THE CONSTRAINTS

It is realistic, not pessimistic, to begin by identifying the obstacles and considerations which affect the design and implementation of the YEDPA. Our new initiatives are constrained by several important factors, and the choice of priorities must be made in recognition of these constraints.

1. Resources. The $1.5 billion annual spending level planned for YEDPA augments but hardly outweighs what is already being spent. Other outlays for employment related programs are almost ten times greater. The $1.5 billion represents roughly $50 per youth age 14-21, or $600 per unemployed youth. It can create only around a quarter of a million full-time minimum wage jobs even if services and overhead are minimized. This would employ only a tenth of jobless youth. In all likelihood, youth who are not now counted as unemployed will enter the work force when new opportunities are available. Though new jobs will be created and important needs met, the impact on measured rates of unemployment will be diluted. It is self-evident, then, that the YEDPA cannot eliminate youth unemployment nor can it buy major institutional reform when it is supplementing a system of much greater magnitude.

2. The Programmatic Foundation. YEDPA efforts must build on and be integrated with existing career development, employment and training activities. It must avoid the risk of substitution. For instance, if existing employment related programs were cut back only 10 percent in light of the new resources, the net output of YEDPA would be almost nil. The Act seeks to provide the knowledge base for more comprehensive youth employment policies. Every effort must be made to avoid locking resources into an operational mode such that it would be difficult to transfer them in the future to approaches of demonstrated merit. Thus, to make the

programs work best, it will be necessary to utilize many existing delivery mechanisms, but at the same time assure that the efforts are seen as new, different, and not necessarily permanent.

3. Limited Staff. Only a handful of people at the national and regional offices are available to design, implement and administer these innovative and ambitious new programs. The employment and training delivery system at all levels has been strained by the rapid expansion of public service employment. Yet the youth programs present an even more formidable challenge, since they envision not just the expansion of existing efforts under tested procedures, but qualitative improvements, new designs and delivery mechanisms. The tasks will be labor intensive but there are a number of reasons why payrolls cannot be expanded. At the Federal level, there are tight ceilings. At the local level, permanent staff should not be expanded too rapidly until the future of the youth programs has been determined.

4. Program Diversity. The objectives of YEDPA are quite complex. There is a range of target groups to be served including in-school/summer youth, out-of-school youth, the economically disadvantaged as well as the nondisadvantaged. A variety of approaches are to be explored, including residential and nonresidential conservation work on public lands, work in community improvement and other areas, work/training plus comprehensive support services for career development, subsidies to private for-profit employers, and opportunities for youth under jurisdiction of the criminal justice system. This overall program diversity, combined with the wide distribution of funds allocated by formula, is a significant burden both administratively and technically. It is extremely difficult to distinguish one youth program from another when they combine many services in varying degrees. Performance is hard to measure quantitatively where placement is only one of the possible constructive outcomes and where the aim may be long-run rather than short-run. With neither inputs nor outputs subject to easy assessment, it will be very hard to determine what works best for whom.

GENERAL PRINCIPLES

The difficult choices which must be made between competing aims and approaches should be based on some guiding principles which are selective and give a sense of priorities. The following principles and assumptions are central in the design and implementation of the YEDPA.

1. Knowledge development is a primary aim of the new youth programs. At every decisionmaking level, an effort must be made to try out promising ideas, to support ongoing innovations and to assess performance as rigorously as possible. Resources should be concentrated and structured so that the underlying ideas can be given a reasonable test. Hypotheses and questions should be determined at the outset, with an evaluation methodology built-in. This does not mean that every youth program must be experimental, but rather that we should move as far as possible in this direction nationally and locally.

2. The content and quality of work experience must be improved. Job creation and work experience will probably remain the major element of these new youth efforts as they have been in the past. But they can and should be upgraded. There are many possible definitions of a "meaningful" job. It is unrealistic to expect that most new work experience positions will serve as first rungs in the career ladders of participants. But the proportion of such carefully structured jobs should be expanded. For the remainder, the emphasis should be on work supervision and output. A structured, productive job setting may provide the best work experience for youth. The national office will seek to develop some measures of work output which can be used locally and will disseminate models of career-oriented approaches which have been tried.

3. Youth participation should be emphasized. The YEDPA is based on the premise that our nation's youth are an underutilized resource. Most young persons can fill responsible positions if they are given a chance, and responsibility is a basic element in the developmental process. Youth should, therefore, be involved at every stage of the design, implemen-

tation and administration of the new programs. The law mandates their participation in advisory councils, and the Department of Labor will establish a national youth group. Public and nonprofit agencies administering the programs cannot expect private employers to do what they will not. Hence, younger persons especially those who have been previous participants in career development, employment and training programs, should be hired for administrative positions whenever possible. In work experience components, there are a number of ways in which youth can serve other youth who need help. Such approaches should be emphasized.

4. Resources should go to those in greatest need. A fundamental principle of public intervention is to help persons who cannot make it on their own. Each program of the YEDPA has its own target group and eligibility requirements which must be enforced. But within any socioeconomic group, there is wide variance in potential and need for assistance. Every effort must be made to avoid the tendency for "creaming" participants who are most responsive and most likely to succeed. Congress has emphasized the use of community-based organizations under the youth programs in the belief that they reach individuals not likely to be served by more traditional approaches. The Department of Labor will seek to assure that all participants meet designated income and eligibility criteria. Local decisionmakers must carry forward with this principle. For instance, if there is a choice between two equal youths, one with work experience and the other without, then the latter should be helped first. If there are two students of like socioeconomic backgrounds and intelligence, but one is doing well in school while the other is having a hard time, the potential drop-out should be served.

5. Substitution must be avoided. The new youth resources represent only a marginal expansion to those already being spent on the career development, employment and training of youth. There will be pressures at every level of decisionmaking to divert existing youth resources to other purposes. Every dollar of substitution reduces the net employment impact of the new youth efforts as well as their experimental payoff and their usefulness in aiding ongoing qualitative improvements. Congress clearly articulated its desire that the

YEDPA add to, rather than substitute for, existing efforts. We will actively seek to enforce this requirement, as difficult as it may be, and hope that State and local decisionmakers make the same commitment.

6. *Overhead must be minimized.* Quality programs will demand good administration, supervision and supportive services. Materials and equipment may be necessary for productive work experience. But there are already many employment and training programs with administrative structures which may be utilized. Public service employment participants are available for supervisory work. Materials, for instance for weatherization, might be secured elsewhere. It is vital that every reasonable economy and coordination be realized. One counselor hired in school may replace 15-20 youths who could alternatively be employed with the same funds. The idea is to serve youths, and unless it can be demonstrated that a service, or its provider, is having a discernible impact and cannot be secured from another source, it should not be funded. Limits on overhead are a way to secure this end but often exclude vital services. There must be some guidelines, but the primary responsibility will be with local decisionmakers.

7. *The new youth programs are not the cutting edge for institutional change.* Congress has not yet decided where it will seek to place emphasis, what changes make sense, or the level of resource commitment. The YEDPA is an attempt to provide the knowledge for such decisions. We do not intend, therefore, to try to force or buy reforms with the YEDPA, though we certainly want to facilitate them. For instance, one-step intake for youth is desirable, with counseling on all the work and service options, but we will not require this. We will instead rely on the judgment of CETA (Comprehensive Employment and Training Act) prime sponsors with the national office encouraging what it believes to be desirable approaches and providing technical assistance. Likewise, the mandate for a local education agency (LEA)-CETA agreement will not by itself achieve educational reform or a significant restructuring of service delivery systems in most cases. We see it as a way to make the education and manpower

"camps" sit down and talk together about their problems progress, and aims in dealing with youth. The more that can be achieved from this dialogue the better, and the national office will try to develop model arrangements, but the regulations will not be prescriptive about the outcome. An attempt will be made to reward areas that achieve exemplary linkages and reforms.

8. Emphasis must be placed on approaches and delivery agents of demonstrated merit. Everyone can agree with the principle that, all else being equal, resources should be distributed on the basis of proven competence. "All else" is seldom equal however, and there are a variety of pressures exerted on decisionmakers with discretionary authority. To avoid this, frequent use is made of formula-funding to simply spread the resources among all parties. In allocating the significant amounts of discretionary money in the YEDPA, the national office will seek to develop nonpolitical mechanisms for selecting and supporting quality projects. Funds will be committed based on the significance of the ideas to be tested, and who can best do the tests. Priority will be given to the use of procedures which assure competition and flexibility in project selection even though, to some degree, this will complicate administration. We would ask that decisionmakers at the State and local levels make the same effort. For instance, community-based organizations can and should be funded where they can do the job; where deficiencies are documented or are not being corrected, the organizations should not be chosen. Creative ideas should be tested, but the best choice of agents to test these ideas would probably be those already involved in higher quality efforts. It is recognizably difficult to put this principle into practice, since performance measures are so difficult to interpret for youth programs. A "hands-on" administrative policy will, therefore, be needed at all levels, with close day-to-day monitoring and inspection insofar as possible.

9. The development of a separate employment and training delivery system for youth is not encouraged. The future of CETA and of youth efforts should be left to Congress when it has the results of the new initiatives. However, a primary aim is to assess nationally and locally what is occurring, and to

seek reasonable coordination among these activities. Planning grants are being provided to prime sponsors to inventory deliverers, their services, approaches, and their youthful clients in each locality. We will seek to integrate information nationally, to catalogue exemplary projects and to provide this information to decisionmakers at all levels. There will be a heavy emphasis on technical assistance, and a hope that everyone will seek to utilize the materials which are provided. The Department of Labor has established an Office of Youth Programs (OYP) with responsibility for YEDPA and the Job Corps. OYP will seek to link YEDPA, Job Corps activities, CETA programs and other efforts for youth.

10. The new youth programs are not permanent. The YEDPA authorizes all programs for one year except for the Young Adult Conservation Corps which is authorized for three years. A $1 billion appropriation was made under the Economic Stimulus Appropriations Act with general acceptance that an additional $0.5 billion supplemental would be forthcoming, if needed. This leaves open the question of duration of funding and the scale of activities which are to be achieved. Though the future is uncertain, we are operating on the assumption–based on a best guess rather than a certain commitment–that the new initiatives will be continued through fiscal 1979 and that a $1.5 billion spending level should be reached by the end of fiscal 1978. The formula-funded programs will be phased in as rapidly as feasible in fiscal 1978. The discretionary funds for demonstration projects will be committed after mechanisms have been established to assure that knowledge development goals are met. It is further assumed that by the end of fiscal 1979, Congress will have assessed the preliminary results of the new initiatives, and will have made a determination about the future of youth programs in the CETA system. In all likelihood, resources for the career development, employment and training for youth will be expanded, but the focus and delivery mechanisms are yet to be decided.

ATTAINABLE OBJECTIVES

The Department of Labor is committed to all of the objectives of the YEDPA, and will do its utmost to achieve as much as possible on every front. However, it is important to be realistic. Rather than setting unattainable targets and subsequently generating disappointment, we are aiming to achieve the following reasonable objectives:

By the end of fiscal 1978

1. The demonstration and formula-funded programs will be operating at a level of $1.5 billion annual expenditures.

2. Nationally and locally, there will be indications of how the new and existing programmatic pieces fit together.

3. A planning framework will have been developed, with identification locally and nationally of available services for youth, the linkages, and early exemplary projects and programs.

4. The first results should be available on costs, clients and services mixes on the most general scale.

5. There will be preliminary indications as to the degree of substitution as measured in terms of dollars spent on youth as well as participant levels.

6. It will be possible to assess whether knowledge development objectives are being met, though the results will not be available.

It will, however, be too early for even the crudest judgments about the effectiveness and impact of the various demonstrations because of the time necessary for program break-in, data collection, and conduct of comparative analyses which are technically sound. By the end of fiscal 1978, Congress will not have the information it needs for broader policy-making, but will be informed on the progress in establishing YEDPA programs and some preliminary outcomes.

By the end of fiscal 1979

1. Information will be available about the short-run impact of different interventions on dropout rates, employment, earn-

ings and some noneconomic dimensions such as crime and recidivism.

2. Formula-funded and demonstration projects will have gone through their initial shake-down and problems and strengths can be identified.

3. Experience will suggest the directions of change, that is, whether substitution is increasing, planning is growing more sophisticated, agreements are becoming more detailed, and programs are improving.

4. Basic conclusions about the feasibility of the myriad demonstrations–their comparative costs and outcomes-should be possible.

5. Reliable national data should be available on the characteristics of participants and the broad services they are receiving.

To the extent Congress wishes to base its decisions concerning youth policies on the above information which mainly concerns processes, directions, and short-run outcomes, it will have the information it needs to target resources and to establish delivery mechanisms.

In the Future

There are substantial lags between demonstration or experimentation, careful analysis of the evidence, and the synthesis of results. The perpetual question is what works best for whom under what circumstances. The answers will not be provided in the first few years, nor are definitive conclusions likely at all, but the knowledge base can be improved substantially.

1. The National Longitudinal Survey, combined with the extended followups intended under several of the segments, should suggest how the programmatic pieces fit into the lives of youth and impact over the longer run. These can help answer the basic questions, such as whether increased school completion fostered under YEDPA leads to greater success in the labor market over time.

2. It should be possible to get a somewhat more refined estimate of the benefits and costs of youth programs. For

instance, the employment impacts, the effects, if any, on crime, the impact on school completion of participants, and the value of output under work experience programs will all be assessed, and the various program outcomes will be compared to program costs.

3. We will improve our knowledge of relatively successful approaches, and perhaps be able to develop a reasonable theoretical basis for our varied public interventions.

PROGRAMMATIC IMPLICATIONS

These principles, constraints and objectives constitute the basic Planning Charter for the YEDPA. But while they suggest directions, they do not provide the degree and detail necessary to guide decisionmakers in implementing their new youth efforts. The crucial question is "What does this all mean in programmatic terms?" The brief descriptions which follow highlight what we believe are the most important elements of the new programs and provide the framework for the guidelines and technical assistance materials which will be forthcoming:

1. Young Adult Conservation Corps (YACC-CETA Title VIII)

a. The purposes of this program are to provide jobs for unemployed youth and to accomplish needed conservation work, while providing as many other services as possible in order to maximize the benefits of the experience for participants. These purposes are to some extent mutually exclusive. Capital, equipment, and supervision expenses may improve output and the value of the experience but increase unit costs which reduce the number of youths who can be employed.

In developing a tripartite agreement, the Departments of Labor, Agriculture, and Interior have weighed these variables and have tried to achieve a reasonable balance. The agreement which has been reached is to hold the per slot cost to $10,500 (an average for fiscal 1978 and 1979, which allows flexibility to cover startup expenses). This will require an initial emphasis on establishing nonresidential camps, with the goal of achieving a 25 percent residential component by the end of fiscal 1978. As a consequence, services and training will be limited, with the major program emphasis being on

supervised work experience in a positive environment.

b. The Departments of Agriculture and Interior will administer the program within the broad guidelines of their interagency agreement with the Department of Labor. Their primary interest under the legislation is to complete needed conservation work. The Department of Labor's primary aim is to keep costs down, to maximize job opportunities and to secure a balanced enrollment. The day-to-day operational decisions will be made by Agriculture and Interior, which will be provided staff for this purpose.

c. Individual application forms for the program will be made available to youths through a variety of methods. Participants and alternates will be selected by a basically random process, which will give preference to those applicants from areas of substantial unemployment (those with a rate of 6.5 percent or higher). Selected applicants will work with individual camp directors and a referral agency to arrange for their enrollment.

d. Extensive job development and placement services cannot be provided by YACC within the constraints of program dollars. However, upon termination, the camp director will refer the enrollee to appropriate local agencies, so that the youth may receive further training or placement assistance.

e. The Departments of Agriculture and Interior will set aside 30 percent of the funds available for a state grant program. They will issue regulations providing for a grant application procedure and will jointly administer the State grant program by working through the Governor of each State.

2. Entitlement Projects (CETA Title III-C: Subpart 1)

a. The basic purpose of Entitlement Projects is to test the notion of whether jobs can be feasibly guaranteed for 16-19 year-old disadvantaged youths who are in school or willing to return, and whether the jobs will increase high school retention, return and completion. This test is to be conducted in areas of substantial size with varying conditions to determine the extent to which such an approach would be feasible nationwide. Because of the high costs of Entitlement, only a few "saturation" tests can be tried on a large scale. But

there are also a number of different secondary notions which are to be tested, and innovative approaches which can be developed. A two-tier approach will, therefore, be tried. The first tier will consist of 4-6 projects covering substantial areas. These will be extensively studied to evaluate the costs and impacts. The second tier will consist of smaller scale projects in a larger number of areas testing a variety of innovative notions.

b. To insure that first-tier projects are operated in accordance with the technical rigor demanded, a careful selection of sites must be made from among the many which might like to participate. Proposals will be solicited in such a way that only prime sponsors willing to commit their own and other youth resources, who have demonstrated competence and are willing to submit to experimental discipline, will receive funds. An assessment will be made of these proposals by an impartial interdisciplinary team, and after site visits and discussions with the major candidates, a final selection will be made. The projects will be funded beginning with the 1978 winter semester. Congress may choose to extend these projects with additional funds in fiscal 1979, but this cannot be guaranteed.

c. More areas will participate in second-tier projects. The solicitation for proposals will indicate some of the alternative approaches to be tested, and new ideas will be entertained. An interdisciplinary and interagency team will again advise the Labor Department in selecting the most promising proposals. The second-tier proposals must include plans for measuring the impacts on employment, school retention and return, and the costs. It is clear, however, that only a minority of all prime sponsors can expect to be awarded either Tier I or II funds. One of the major criterion for selection will be a demonstrated commitment to improving in-school career development, employment, and training efforts. The chance for participation in Entitlement Projects is consciously intended as an inducement for voluntary cooperation under the LEA-CETA agreements mandated under YET (Subpart 3) discussed subsequently.

d. A selected nonprofit group will have responsibility for research, design, technical assistance, and management monitoring. Contracts signed with prime sponsors will

be carefully drawn to insure the oversight and rigor demanded in an experimental program, and to identify the responsibilities and powers of the nonprofit group. This is a demonstration, not a continuing program.

3. Community Improvement (CETA Title III-C: Subpart ?)

a. Our view of the Community Improvement program is that it seeks to employ youth in well-supervised work with a tangible output which will be of benefit to the community. The work itself will be the source of training, with academic credit arranged where appropriate, but there will be little emphasis on services. Most projects should be organized by community and neighborhood groups such as YMCA's and anti-poverty organizations, perhaps in cooperation with building trades councils.

b. By law the jobs are open to unemployed persons age 16 to 19. The immediate question is the split between employment for in-school and out-of-school youths, as well as between summer and nonsummer efforts. Community improvement was intended as a distinct program to test a specific notion. We will, therefore, target the large majority of resources to year-round projects for out-of-school youths, and the balance for year-round projects for in-school youths which are a part of structured work-study programs, rather than having the resources lumped in with other CETA in-school and summer programs. In fiscal 1978, there will be expansion through the summer, but it is intended that the summer projects be continued in the fall.

c. The law envisioned a competition to select the best projects within each State but this is administratively very difficult. We will, therefore, seek to decentralize the competition further. CETA prime sponsors are to prioritize submissions within their boundaries. DOL will provide prime sponsors with planning estimates based on their relative unemployment levels. They will select the highest priority projects up to the planning figure, with a few alternates. Comment procedures will be established, with particular attention to review by organized labor, and if it is found that a project is inadequate, it will be rejected, with acceptance of the project having next highest priority. If reasonable selections have not been made by

a prime sponsor, or if agreement cannot be achieved locally, only acceptable projects will be funded and the remainder of the funds below the planning figure will be redistributed within the State.

d. The regulations will seek to insure that the projects are neighborhood-based, that the needs of program agents have been considered, and that the basic concept of community improvement is met, i.e., that youths will be working on tangible outputs under close supervision. The law also contains complex wage-setting provisions. DOL expects that youth in entry-level jobs will be paid the Federal or local minimum wage, whichever is higher, unless the prevailing wage for youths in such jobs is also higher. If youths are employed in a structured setting leading to apprenticeable skills and these youths are experienced beyond the entry level, or if the jobs are merely extensions of existing ones filled by adults with similar skills and stability of employment, then a higher wage will be paid. Organized labor must be consulted and will have the right to comment on wage levels and displacement. There is a fine line between trying to create "meaningful" work opportunities and substituting for existing workers. There is no simple answer for resolving this; DOL intends, however, that prime sponsors, employers, and unions will take positive steps to consider the needs of both youth and adult workers, and to resolve issues locally.

e. Discretionary Community Improvement funds will be used in two ways: First, to replicate model Community Improvement approaches in different areas under a rigorous experimental design in order to test the feasibility of the approach, the value of the output, and the impact on youths; second, to test the idea of neighborhood-based decisionmaking by funding a few selected community development groups to implement youth projects. The first demonstration will be operated by a specially created nonprofit corporation with representatives from business, labor, community groups and education; the second will be operated under the auspices of the Department of Housing and Urban Development.

4. Youth Employment and Training (YET, CETA Title III-C: Subpart 3)

a. The YET authorizes the same types of activities for youth as are allowed and currently funded under Title I of CETA (and also financed from other sources). The intent, however, is to improve the quality and coordination of such services. The annual plan and youth councils are intended as mechanisms for gathering and analyzing information about the complete range of career development, education and training efforts in the community, and for targeting extra resources where they will be most needed and productive. A national group of youth will be established who are representative of the interests of young persons who are having employment difficulties. The LEA-CETA agreement demands a frank dialogue between the education and manpower establishments. This will be an opportunity for both parties to think through what they are doing separately and what they can do together for youth. For instance, career and vocational education, work study, cooperative education, in-school work experience and counseling may all be occurring within the same school system without any cognizance or coordination. Decisionmakers in the schools should take stock of all such activities in determining the best way to meet the needs of in-school youth.

b. Work experience in school and out will be a primary element of YET. Congress stated clearly that it wanted more "meaningful" jobs than in the past and detailed specific requirements which will be in the regulations. If funded under YET, in-school work experience must be linked to a program of job information, counseling guidance and placement, and integrated into the educational format. This is a goal which should be pursued for all in-school and out-of-school work experience, and, so far as possible, YET funds should be used to supplement, coordinate and upgrade other work experience activities for youth. Where this is not feasible, the minimum requirement should be structured, supervised work settings where a day's work is done for a day's pay. To the extent feasible, in-school and summer offerings should be closely integrated.

c. If qualitative and quantitative improvements are to be achieved, it is vital that the YET resources not be substituted for those already committed. There are many forms of substitution, all of which should be avoided. CETA Title I youth participants should not be cut back in light of YET funds. Schools should not seek to finance counseling and teaching needs under the LEA agreements rather than through local resources. More subtly, the same number of youth should not be served under Title I with less expensive services; and schools should not simply hire laid-off counselors or shop teachers under the guise of career development reforms. It is difficult to determine when a decision is reasonable and when it is substitution. It is certainly very difficult to judge from the regional or national office unless the case is extreme. DOL will try to monitor the substitution issue as firmly as possible because this is the aim of the law. We will seek to insure that there is no reduction in the number of young participants under Title I. But the primary enforcement must be done locally. Youth councils must protect the interests of youth in CETA system decisions. LEA's must seek to assure that the extra resources coming to them are new, not just supporting longstanding work experience programs contrary to the intents of YET. Prime sponsors must make sure that they are getting quantitative and qualitative improvements in schools when they sign agreements with LEA's. Everyone must make a best effort despite the time pressures since the tone set in the first year plans and agreements will tend to carry over in any future youth activities

d. A fundamental aim of YEDPA is "knowledge development," i.e., to learn nationally and locally how best to assist disadvantaged and other youth to overcome barriers to completing high school, to entering the world of work, and to achieving job stability and advancement. To realize this goal, YET discretionary funds will be focused on carefully structured experiments to test the national youth service concept, educational entitlement vouchers for work experience, alternative education and career development approaches for dropouts and "high risk" students, a variety of private sector subsidy methods, the impact of employment on delinquency, and models for in-school programs. A detailed "knowledge development" plan for these activities has been generated. There will be a wide range of projects throughout the country

to experiment with all these activities, with the choice of sites from many interested prime sponsors on the basis of demonstrated merit as judged by balanced interdisciplinary panels. These projects will directly benefit youth, but they will also be designed to answer many of the questions which underlie youth employment policies.

The regulations will require each prime sponsor and its planning council to identify model career development, employment and training efforts for youths in its area. The results will be used for local and national catalogues of exemplary programs. The plan should also include local "knowledge development" goals and methods. What this means, simply, is that the sponsors and councils should sit down at the start of the year and ask themselves what they would like to learn over the coming year(s) from their own experiments and evaluations. The intent of YET is that localities develop new model programs and run their own tests. It is not necessary to be overly ambitious but merely to do what is feasible in this direction. For instance, the YEDPA permits 10 percent of YET funds to be used for experiments with services to nondisadvantaged youths to test the notion that there are increased benefits to the disadvantaged when programs enroll participants of all economic backgrounds. Prime sponsors are encouraged to develop such tests, if they meet analytic requirements set forth in the regulations.

5. Job Corps

a. The Job Corps is an integral part of employment and training efforts. This longstanding program offers intensive vocational training, basic education and other services in residential and nonresidential settings to the most disadvantaged youth. An effort is being made to double the number of Job Corps slots to 44,000 by the end of fiscal 1978. If this goal is to be achieved, coordination will be needed with YEDPA and other CETA programs. Referral to the Job Corps must become one of the planned and realized options for youth in local employment and training programs. Job Corps referral targets and mechanisms will be required in YET youth employment and training plans.

b. It is hoped that a variety of innovative Job Corps centers will be opened. These will need close linkages with the prime

sponsors in the areas where they are located. One of the ideas is to establish a small residential facility to train mature, upwardly mobile disadvantaged youths for careers in manpower planning and administration. Every attempt would be made to guarantee jobs for completers in the CETA systems from which they are referred. As far as possible, the delivery systems should reserve their own job opportunities for those they previously trained and aided.

THE CHALLENGE

This Charter has attempted to clearly articulate the constraints and principles which have governed our administrative policymaking, the objectives which we feel are reasonable, and the programmatic implications. We have tried to highlight our initial decisions. It is recognized and intended that emerging experience, give and take between interest groups, unexpected problems, and changes or further specifications of Congressional intent, will strongly influence the design and implementation of the new youth initiatives. A revision of the Planning Charter will be issued next year. For the present time, however, this document serves as the framework for the development of the YEDPA efforts.

We have tried our best to combine balance, reason and pragmatism with vision and commitment to change. Compromises and tradeoffs were involved, and there will be differences of opinion about the choices. Yet, we trust that this Planning Charter will be accepted for what it is-a sincere attempt to explain ourselves before plunging into the complex and challenging tasks of designing, implementing and administering the new youth programs. The Youth Employment and Demonstration Projects Act provides the resources and the mandate to significantly improve the present and future employment prospects of our Nation's youth. We must all work together, with a spirit of optimism and commitment, tempered with realism, to achieve the promise of this important legislative initiative.

GPO 919-708